

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2019-290-WS

In the Matter of:)	
)	
Application of Blue Granite Water Company for Approval to Adjust Rate Schedules and Increase Rates)	BLUE GRANITE WATER COMPANY’S FIRST REQUEST FOR PRODUCTION TO THE CONSUMER ADVOCATE
)	
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Pursuant to S.C. Code Ann. Regs. 103-833(C), Blue Granite Water Company (the “Company”) by and through its legal counsel hereby submits this First Request for Production to the South Carolina Consumer Advocate (the “Consumer Advocate”). Please forward to the undersigned, via email, your first iteration of responses to the following request on or before December 26, 2019:

- 1-1 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom the Consumer Advocate intends to use as a witness at the hearing in this case. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that the Consumer Advocate must promptly transmit to the Company the requested information as it becomes available.

- 1-2 Please provide detailed work papers—in original MS Excel format with intact formulas and links—supporting the modifications, disallowances, or adjustments identified in response to Interrogatory 1-2. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that the Consumer Advocate must promptly transmit to the Company the requested information as it becomes available.

- 1-3 Please provide any documents, records, or other information in any form referred to or relied upon in any of the Consumer Advocate’s responses to the Company’s First Set of Interrogatories. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that the Consumer Advocate must promptly transmit to the Company the requested information as it becomes available.

Dated this 4th day of December, 2019.

s/Samuel J. Wellborn
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